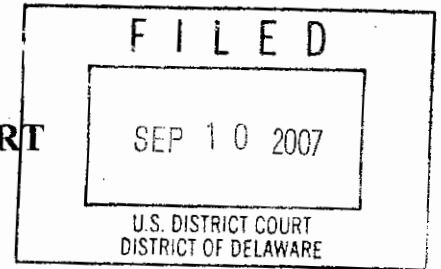


**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**



JAMES ST. LOUIS,
PLAINTIFF,

v.

LT. CHERYL MORRIS et al,
DEFENDANTS.

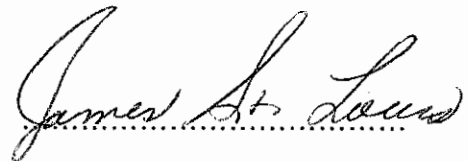
C.A.No. 06-236- SLR
JURY TRIAL REQUESTED

**PLAINTIFFS' RESPONSE TO
DEFENDANT'S RESPONSE FOR AN INJUNCTION RELIEF**

1. Plaintiff again aggress with the attorney for the defendants **however** plaintiff was given the right to speak for the other inmates in the kitchen when the defense attorney allowed him to list every individual working in said kitchen from the time of his employment to the present. (see discovery) Plus those who have been listed as witnesses have been retaliated against, see exhibit 1, or have had the inmate supervisor write things up and submit to Lt. Morris for disciplinary action as the case for inmate Getz, who informs me like the other inmate witnesses as to present conditions. There are at least 4 or 5 grievances for these actions as in the Evans exhibit.
2. Plaintiff asks the defense attorney if it is legal to now to have inmates supervise other inmates, threatening them bribing them, extorting them and outright intimidate the now that plaintiff is **not** working in the kitchen?
3. Plaintiff ask that Judge Sue Robinson issue an order to produce paper work on incident reports of inmate actions that involve these violations to prove that these issues do exist and to issue an order to prison authorities as to produce their investigation from June 2005 as to the solicitation of kitchen officers for the purpose of stopping plaintiff from bringing these allegation to be addressed. Plaintiff also ask Judge to order a copy of Lt. Morris' reports so she can see first hand what plaintiff is talking about, or at least order for there safety and not be shredded.

4. Plaintiff brings forth from evidence already given this court and defense that the plaintiff did address this issue with prison authorities and they refused to address them.
5. Plaintiff wishes to address the issue of defendants manipulating and questioning inmates as to their testimony to be offered into evidence and their intimidation of inmates to address these constitutional violations, as seen in the addressed issue to inmate Hawkins and what his testimony will be if he is called into court or what was his part in the allegation against Johnson as asked by Lt. Morris.
6. Plaintiff acknowledges he is not as well informed in legal matters as Ms. Kelly and doesn't have the influence she has **but** plaintiff realizes that it is a massive violation to have to live under these conditions.
7. In short Plaintiff is not as educated as defense counsel into the matters of constitutional law **but** hopes this court will at least give him and the inmates within these walls the rights they deserve even if plaintiff did not follow legal protocol.

Date: Tuesday, September 04, 2007

A handwritten signature in cursive script, reading "James St. Louis". The signature is written in dark ink and is positioned above the printed name.

JAMES ST. LOUIS

1181 PADDOCK RD

SMYRNA DE. 19977

EILEEN KELLY

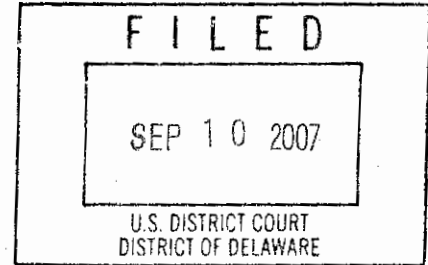
July 19, 2007

DEPUTY ATTORNEY GENERAL

DEPARTMENT OF JUSTICE

820 N. FRENCH ST. 6th FLOOR

WILMINGTON, DE. 19801



DEAR COUSELOR;

On June 27, 2006 I filed a motion to Amend Complaint. Within this motion was a list of (8) eight names who would be witnesses, of which Richard Russell and Henry Duhadaway were listed as #6 and #5 respectfully. At that time both inmates were employed in the kitchen Russell on the A.M. shift and Duhadaway on the P.M. shift. Since the openness of these two witnesses has been brought forth both have loss their job and have been transferred to another prison in Georgetown without any reason given. I can only hope that your office along with the DOC did not have anything to do with this unfortunate timing that leads one to believe other wise. Within this discovery there are names of new inmates willing to come forth. I can only hope you will do everything in your power to make sure this 'coincidence' doesn't happen again. Thank you for your time and I hope we do not need to file for a motion of protection.

James St. Louis

JAMES ST. LOUIS

1181 PADDOCK RD.

SMYRNA DE. 19977

CC: UNITED STATES DISTRICT COURT

DISTRICT OF DELAWARE

Exhibit 1

DCC Delaware Correctional Center
Smyrna Landing Road
SMYRNA DE, 19977
Phone No. 302-653-9261

Date: 08/27/2007

GRIEVANCE REPORT

OFFENDER GRIEVANCE INFORMATION

Offender Name : EVANS, CLYDE F	SBI# : 00205823	Institution : DCC
Grievance # : 139756	Grievance Date : 08/16/2007	Category : Individual
Status : Unresolved	Resolution Status :	Resol. Date :
Grievance Type: Job Issues	Incident Date : 08/12/2007	Incident Time : 04:00
IGC : McCreanor, Michael	Housing Location : Bldg T1, Cell 1, Bed 16	

OFFENDER GRIEVANCE DETAILS

Description of Complaint: Last year I had a problem counting and as a 3rd Cook was demoted to Line Server for 90 days as punishment. Since then I have become a witness in a civil suit against Lt. Morris and 6 defendants. I was to return to work as 3rd Cook but on Sunday, August 12, 2007 I was told by Mr. Hughes and Lt. Morris that I wasn't going back to 3rd Cook or to help the cooks or Diet Cooks. I already served my punishment and believe this is a retaliation for being a witness in this civil suit, which is a constitutional issue.

Remedy Requested : I want some one to look into this action, seeing as how I am not the only one this is happening to, and take the correct action necessary.

INDIVIDUALS INVOLVED

Type	SBI #	Name

ADDITIONAL GRIEVANCE INFORMATION

Medical Grievance : NO	Date Received by Medical Unit :
Investigation Sent :	Investigation Sent To : Klein, Christopher
Grievance Amount :	

Exhibit 2

Certificate of Service

I, James St. Louis, hereby certify that I have served a true

And correct cop(ies) of the attached: Motion : To Compel /

Protection & Gag order / Answer to states response upon the following
to sever & injunctions
parties/person (s): w/ evidence.

TO: Department of Justice
State Office Building
520 N. French St.
Wilmington De 19801
c/o Atty. Kelly

TO: _____

TO: United States District
Court for Delaware
844 King Street
Wilmington De. 19801
c/o Court Clerk

TO: _____

BY PLACING SAME IN A SEALED ENVELOPE, and depositing same in the United States Mail at the Delaware Correctional Center, Smyrna, DE 19977.

On this 7th day of Sept., 2007

James St. Louis